

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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|---------------|---|--------------------|
| IN RE: | : | |
| Erskine Hicks | : | |
| | : | Chapter 13 |
| | : | |
| Debtor | : | Case No.: 14-19926 |

MOTION TO MODIFY PLAN AFTER CONFIRMATION

The Debtor, Erskine Hicks, by and through his undersigned counsel, hereby moves to modify the Chapter 13 Plan and in support thereof aver as follows:

1. Debtor filed a Chapter 13 Bankruptcy on or about December 18, 2014.
2. The Chapter 13 filing was assigned case number 14-19926.
3. The Chapter 13 Plan was confirmed by this Honorable Court on or about October 8, 2015.
4. On or about April 11, 2019 the Debtors and the mortgagee, entered into a Stipulation resolving the pending Motion for Relief.
5. Per the Stipulation, the Debtors are delinquent in the sum of \$18,481.86 in post-petition mortgage payments.
6. In accordance with the Stipulation, specifically, paragraph number 2(a) the Debtor will cure the subject ~~\$18,481.86~~ by modifying the Chapter 13 Plan.
7. In furtherance of the Stipulation and the Debtors curing the post-petition delinquency, this Motion and Modified Chapter 13 Plan are being contemporaneously filed.

8. The Debtors' proposed modified Chapter 13 Plan, attached hereto as "**Exhibit A**", increases the Debtor's Plan payment by approximately \$2,873.59 per month (including attorney and trustee fees) and is deemed affordable by the Debtors.

WHEREFORE, the Debtor requests that he be permitted to modify his Chapter 13 Plan for the above-stated reasons.

Dated: April 19, 2019

/s/Brad J. Sadek, Esq
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